PIA Analysis Worksheet and Summary Template

The template for an information technology (IT) system Privacy Impact Assessment (PIA) Analysis Worksheet and Summary Template begins on the following page. The Template covers the four major categories of information required for inclusion into the PIA: system characterization, information sharing practices, Web site practices, and security controls.

NASA IT Privacy Impact Assessment (PIA) Analysis Worksheet

The PIA determines what kind of information in identifiable form (IIF), if any, is contained within a system, what is done with that information, and how that information is protected. Systems with IIF are subject to an extensive list of requirements based on privacy laws, regulations, and guidance.

Identifying Numbers (Use N/A for items that are Not Applicable)

Application Name (generally the name that the system is accessed by. www.nasa.gov, when Web enabled, for example):	Texas Aerospace Scholars
Application Owner:	Charla Stuart
(Person who is responsible for funding)	Phone Number: <u>281.483.7617</u> E-Mail: <u>cstuart@ems.jsc.nasa.gov</u>
System Manager	Mauricio Rodriguez
(Responsible for system technical operation)	Phone Number: 281.244.0331 E-Mail: mrodrig1@ems.jsc.nasa.gov
NASA Cognizant Official:	Douglas Goforth
(NASA individual responsible for	Phone Number: _281.483.9111
management of daily operations)	E-Mail: Douglas.w.Goforth@nasa.gov
Activity/Purpose of Application:	Distribute information to participants of the Texas funded program, collect Information on applicants, handle homework assignments that are submitted by participants, handle travel itineraries, team assignments,
	Mentor – teacher- and coop placement.
Mission Program/Project Supported:	
	N/A - Education
IT Security Plan Number:	
	<u>SPAH0010</u>
System Location (Center or contractor office	Center/Contractor: _JSC
building, room, city, and state):	Street Address: 2101 NASA Parkway
	Building: 21 Room 221
	City _ <u>Houston</u> ST_ <u>TX</u> ZIP_ <u>77058</u>
Privacy Act System of Records (SOR) Number:	<u>10-SPER</u>
OMB Information Collection Approval Number and Expiration Date:	
Other Identifying Number(s):	

	Briveey Question Sets	Use	er Respo	onse	
No.	Privacy Question Sets	Yes	No	N/A	Comments
	System Chara	cterizati	on and [Data Cate	egorization
1	Has/Have any of the major changes listed in the Comments column occurred to the system since April 2003 or the conduct of the last PIA? If yes, please check which change(s) have occurred.				
					☐ Alteration in Character of Data
2	Does/Will the system contain Federal records?				
3	If the system contains/will contain Federal records, under which disposition authority item in the NASA Records Retention Schedules or the General Records Schedules are/will the records be retained and disposed of or archived?				Schedule Item: Schedule 1 Item 32 Sub-Item A
4	Do the records in the system pertain to active programs/projects?				
5	Are the records Vital records for the organization?				
6	Are backup files (tapes or other media) being stored off-site? If yes, please indicate in the comment field where backups are located.				Backup storage location : _5078 South Loop East, Houston, TX 77058

	Privacy Question Sets	Use	er Respo	nse	
No.	·	Yes	No	N/A	Comments
7	Does/Will the system contain (store) information in identifiable form (IIF) within any database(s), record(s), file(s) or Web site(s) hosted by this system? Note: If yes, check all that apply in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category. Please note: This question seeks to identify all personal information contained within the system. This includes any IIF, whether or not it is subject to the <i>Privacy Act</i> , whether the individuals are employees, the public, research subjects, or business partners, and whether provided voluntarily or collected by mandate. Later questions will try to understand the character of the data and its applicability to the requirements under the <i>Privacy Act</i> or other legislation. [Autofill all relevant questions with N/A.]	⊠	on and L		Personal Information: Name Date of birth Social Security Number (or other number originated by a government that specifically identifies an individual) Photographic identifiers (e.g., photograph image, x-rays, and video) Driver's license Biometric identifiers (e.g., fingerprint and voiceprint) Mother's maiden name Vehicle identifiers (e.g., license plates) Mailing address Phone numbers (e.g., phone, fax, and cell) Medical records numbers Medical notes Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) Certificates (e.g., birth, death, and marriage) Legal documents or notes (e.g., divorce decree, criminal records, or other) Device identifiers (e.g., pacemaker, hearing aid, or other) Web Uniform Resource Locators (URL) E-mail address Education records Military status and/or records Employment status and/or interests Other:
8	Indicate all the categories of individuals about whom IIF is or will be collected.				⊠ Employees □ Public citizens □ Patients □ Business partners/contacts (federal, state, local agencies) □ Vendors/Suppliers/Contractors □ Other

No.	Privacy Question Sets	Use	r Respo	nse	Comments
140.		Yes	No	N/A	
9	Are records on the system (or will records on the system be) retrieved by one or more data elements? Note: If yes, specify in the Comments column data elements will be used in retrieving the records (i.e., using a record number, name, social security number, or other data element or record locator methodology). If the category of personal information is not listed, please check "Other" and identify the category.	⊠	on and E	□	Personal Information: Name Social Security Number (or other number originated by a government that specifically identifies an individual) Photographic identifiers (e.g., photograph image, x-rays, and video) Driver's license Biometric identifiers (e.g., fingerprint and voiceprint) Mother's maiden name Vehicle identifiers (e.g., license plates) Mailing address Phone numbers (e.g., phone, fax, and cell) Medical records numbers Medical notes Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) Certificates (e.g., birth, death, and marriage) Legal documents or notes (e.g., divorce decree, criminal records, or other) Device identifiers (e.g., pacemaker, hearing aid, or other) Web Uniform Resource Locators (URL) E-mail address Education records Military status and/or records Employment status and/or interests Other:
10	Are/Will records on 10 or more individuals containing IIF [be] maintained, stored or transmitted/passed through this system?	⊠			
11	Is the system (or will it be) subject to the <i>Privacy Act</i> ? Note: If the answer to questions 7, 9, and 10 were yes, the system will likely be subject to the <i>Privacy Act</i> . System owners should contact their Center PAM for assistance with this question if they are uncertain of the applicability of the <i>Privacy Act</i> .	×			Autofill"yes" when yes is marked for 7 and 9; "no," if 7 and 9 are marked "no."
12	Has a <i>Privacy Act</i> System of Record (SOR) Notice been published in the Federal Register for this system? Note: If no, explain why not in the Comments column.				□ No IIF is contained in the system. □ IIF is in the system, but records are not retrieved by IIF. □ Should have published an SOR, but was unaware of the requirement. □ System is required to have an SOR but is not yet procured or operational. □ Other: _ID-SPER
13	If a SOR Notice has been published, have major changes to the system occurred since publication of the SOR?		×		
		mation	Sharing	Practice	S
14	Is the IIF in the system voluntarily submitted (or will it be)?				

No.	Privacy Question Sets	Use	er Respo	nse	Comments
IVO.		Yes	No	N/A	Comments
15	Does/Will the system collect IIF directly from individuals? Note: If yes, identify in the Comments column the IIF the system collects or will collect directly from individuals. If the category of personal information is not listed, please check "Other" and identify the category.				Same as #7
16	Does/Will the system <i>collect</i> IIF from <i>other resources</i> (i.e., databases, Web sites, etc.)? Note: If yes, specify the resource(s) and IIF in the Comments column.				
17	Does/Will the system populate data for other resources (i.e., do databases, Web sites, or other resources rely on this system's data)? Note: If yes, specify resource(s) and purpose for each instance in the Comments column.				☐ Resource: ☐ Resource: ☐ Resource: ☐ Resource: ☐ Resource:
18	Does/Will the system share or disclose IIF with agencies external to NASA, or other people or organizations outside NASA? Note: If yes, specify with whom and for what purposes, and identify which data elements in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category.	⊠			With whom and for what purposes: student email addresses are shared with teachers of the team to which they are assigned

	Drivery Overtice Sets	Use	er Respo	onse	_
No.	Privacy Question Sets	Yes	No	N/A	Comments
19	If the IIF in the system is or will be matched against IIF in one or more other computer systems internal or external to NASA, are (or will there be) computer data matching agreement(s) in place? If yes, indicate in the Comments column internal or external and the system(s) with data which are matched.		×		Location of other systems involved in matching: Internal NASA External to NASA Other systems involved:
	If data matching activities will occur, will				If answered "No," auto fill 20 with N/A.
20	the IIF be de-identified, aggregated, or otherwise made anonymous? Note: If yes, please describe this use in the Comments column.				☐ De-identified ☐ Aggregated ☐ Other
21	Is there a process, either planned or in place, to notify organizations or systems that are dependent upon the IIF contained in this system when changes occur (i.e., revisions to IIF, when the system encounters a major change, or is replaced)?				The system is only used for one purpose
22	Is there a process, either planned or in place, to notify and obtain consent from the individuals whose IIF is in the system when major changes occur to the system (e.g., disclosure and/or data uses have changed since the notice at the time of the original collection)?				The system is only used for one purpose
23	Is there/Will there be a process in place for individuals to choose how their IIF data is used? Note: If yes, please describe the process for allowing individuals choice in the Comments column.				Process: The system is only used for one purpose
24	Is there/Will there be a complaint process in place for individuals who believe their IIF has been inappropriately obtained, used, or disclosed, or that the IIF is inaccurate? Note: If yes, please describe briefly the notification process in the Comments column.			×	Process:_contact info is given to the individuals but no official procedure is in place.
25	Are there or will there be processes in place for periodic reviews of IIF contained in the system to ensure the data's integrity, availability, accuracy, and relevancy? Note: If yes, please describe briefly the review process in the Comments column.			⊠	Process: integrity and availability are required by IT Security. Accuracy and relevancy are part of our informal process for determining what and how data is collected.

Na	Privacy Question Sets	Use	er Respo	onse	Comments
No.	Tittady Question octs	Yes	No	N/A	Comments
26	Are there/Will there be rules of conduct in place for access to IIF on the system? Note: If yes, identify in the Comments column all users with access to IIF on the system and for what purposes they use the IIF.				☐ Users ☐ Administrators ☐ Developers ☐ Contractors For what purposes: ☐ users – to view their own data ☐ admin – to manage the program ☐ developers – they manage the database ☐ contractors – same as developers ☐
27	Is there a process in place to log routine and non-routine disclosures and/or unauthorized access? If yes, check in the Comments column which kind of disclosures are logged.				Disclosures logged: Routine Non-routine Public Internet we do not disclose information to non-nasa personnel
	Web	site Hos	st – Que	stion Se	ts
28	Note: If yes, identify what type of site the system hosts in the Comments column. If no, check "No" for all remaining questions in the "Web Site Host Question Sets" section and answer questions starting with the "Administrative Controls" section beginning with question 42.				Type of site: Public Internet: secure connection Internal NASA Both
29	Is the Web site (or will it be) accessible by the public or other entities (i.e., federal, state, and local agencies, contractors, third-party administrators, etc.)?				The website is , but the IIF is under a secure server and is password protected
30	Is the Agency Web site privacy policy statement posted (or will it be posted) on the Web site?				
31	Is the Web site's privacy policy in machine-readable format, such as Platform for Privacy Preferences (P3P)? Note: If no, please describe in the Comments column your timeline to implement P3P requirements for this system.		⊠		Implementation Plan Being worked at Agency Level

	Brivany Question Sets	Use	er Respo	onse	
No.	Privacy Question Sets	Yes	No	N/A	Comments
32	Does the Web site employ (or will it employ) persistent tracking technologies? Note: If yes, identify types of cookies in the Comments column. If persistent tracking technologies are in place, please indicate the official who authorized the use of the persistent tracking technology.		⊠		
33	Does/Will the Web site collect or maintain personal information from or about children under the age of 13?				
34	If the Web site does/will collect or maintain personal information from or about children under the age of 13, please indicate what information and how the information is collected.				☐ Actively directly from the child ☐ Passively through cookies ☐ Both of the above What Information collected: ————————————————————————————————————
35	If the Web site does/will collect or maintain personal information from or about children under the age of 13, is the information shared with any non-NASA organizations, grantees, universities, etc. Note: If yes, also identify the non-NASA organizations in the comments field			×	Information is shared with: If "no," autofill "N/A" in items 36 & 37.
36	If the Web site does/will collect or maintain personal information from or about children under the age of 13, specify in the comments field what method is used for obtaining parental consent.				Method used for obtaining parental consent (please check all that apply) No consent is obtained Simple email email accompanied by digital signature signed form from the parent via postal mail or facsimile accepting and verifying a credit card number in connection with a transaction taking calls from parents, through a toll-free telephone number staffed by trained personnel

No.	Privacy Question Sets	Use	er Respo	onse	Comments
	•	Yes	No	N/A	55
37	Does/Will the Web site collect IIF electronically from any individuals? Note: If yes, identify what IIF the system collects in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category.				Personal Information: Name Date of birth Social Security Number (or other number originated by a government that specifically identifies an individual) Photographic identifiers (e.g., photograph image, x-rays, and video) Driver's license Biometric identifiers (e.g., fingerprint and voiceprint) Mother's maiden name Vehicle identifiers (e.g., license plates) Mailing address Phone numbers (e.g., phone, fax, and cell) Medical records numbers Medical notes Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) Certificates (e.g., birth, death, and marriage) Legal documents or notes (e.g., divorce decree, criminal records, or other) Device identifiers (e.g., pacemaker, hearing aid, or other) Web Uniform Resource Locators (URL) E-mail address Education records Military status and/or records Employment status and/or interests Other:
38	Does/Will the Web site provide a PDF form to be completed with IIF from any individuals and then mailed or otherwise provided to NASA? Note: If yes, identify what IIF the PDF form collects in the Comments column. If the category of personal information is not listed, please check "Other" and identify the category.				Personal Information: Name □ Date of birth □ Social Security Number (or other number originated by a government that specifically identifies an individual) □ Photographic identifiers (e.g., photograph image, x-rays, and video) □ Driver's license □ Biometric identifiers (e.g., fingerprint and voiceprint) □ Mother's maiden name □ Vehicle identifiers (e.g., license plates) □ Mailing address □ Phone numbers (e.g., phone, fax, and cell) □ Medical records numbers □ Medical notes □ Financial account information and/or numbers (e.g., checking account number and Personal Identification Numbers [PIN]) □ Certificates (e.g., birth, death, and marriage) □ Legal documents or notes (e.g., divorce decree, criminal records, or other) □ Device identifiers (e.g., pacemaker, hearing aid, or other) □ Web Uniform Resource Locators (URL) □ E-mail address □ Education records □ Military status and/or records □ Employment status and/or interests □ Other: □

		Use	er Respo	onse	
No.	Privacy Question Sets	Yes	No	N/A	Comments
39	Does/Will the Web site share IIF with organizations external to NASA, or other people or organizations outside NASA? Note: If yes, specify with whom and for what purposes.	×			With whom and for what purposes: ⊠ email address of students are provided to teachers □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □
40	Are rules of conduct in place (or will they be in place) for access to IIF on the Web site? Note: If yes, identify in the Comments column all categories of users with access to IIF on the system, and for what purposes the IIF is used.				□ Users □ Administrators □ Developers □ Contractors For what purposes: □ users – to view their own data □ admin – to manage the program □ developers – they manage the database □ contractors – same as developers
41	Does (or will) the Web site contain links to sites external to the Center that owns and/or operates the system? Note: If yes, note in the Comments column whether the system provides a disclaimer notice for users that follow external links to Web sites not owned or operated by the Center.	⊠			☑ Disclaimer notice for all external links
		dministi	rative Co	ontrols	
42	Have there been major changes to the system since it was last certified and accredited? Note: If the system is under development and not yet certified and accredited at the time of this PIA, please describe in the Comments column the plan and timeline for conducting a certification and accreditation (C&A) for this system.				
43	Have personnel (system owners, managers, operators, contractors and/or program managers) using the system been (or will they be) trained and made aware of their responsibilities for protecting the IIF being collected and maintained?				Informally trained through verbal communications concerning the sensitivity of IIF and the way it should be handled, including the rules of conduct.

	Brivacy Question Sets	Use	er Respo	onse	
No.	Privacy Question Sets	Yes	No	N/A	Comments
44	Who has /will have access to the IIF on the system? Note: Check all that apply in the Comments column.				□ Users only their own IIF □ Administrators 1 FTE □ Developers 2 contractors □ Contractors 3 program leads - contractors □ Other
45	If contractors operate or use the system, do the contracts include clauses ensuring adherence to privacy provisions and practices?				
46	Are methods in place to ensure that access to IIF is restricted to only those required to perform their official duties? Note: If yes, please specify method(s) in the Comments column.				No database access is given to people that Do not need it
47	Are there policies or guidelines in place for the retention and destruction of IIF within the application/system? Note: If yes, please provide some detail about these policies/practices in the Comments column.				NPR 1441.1
		Techni	cal Con	rols	
48	Are technical controls in place to minimize the possibility of unauthorized access, use, or dissemination of the data in the system (or will there be)?				
49	Are any of the password controls listed in the Comments column in place (or will they be)? Note: Check all that apply in the Comments column.	⊠			 ☑ Passwords expire after a set period of time. ☑ Accounts are locked after a set period of inactivity. ☑ Minimum length of passwords is eight characters. ☑ Passwords must be a combination of uppercase, lowercase, and special characters. ☑ Accounts are locked after a set number of incorrect attempts. Controls will be in place soon.
50	Is there (or will there be) a process in place to monitor and respond to privacy and/or security incidents?				
		Physic	al Cont	rols	1
51	Are physical access controls in place (or will they be)				
	place to monitor and respond to privacy and/or security incidents? Are physical access controls in place (or	Physic	cal Cont	rols	Controls will be in place soon.

PIA Analysis Worksheet Contact Information

Signature of NASA Cognizant O	fficial	Date
Print Name		Title/Position
Center and Office/Department		
Street Address		
Street Address		
City, State and Zip Code		
Phone Number	Fax Number	

^{***}Please go to the next page and complete the PIA Summary. This Summary will be made publicly available at http://www.NASA.gov/pia.***

Privacy Impact Assessment (PIA) Summary

Date of this Submission (MM/DD/YYYY): 08/31/2005

NASA Center: Johnson Space Center

Application Name: Texas Aerospace Scholars

Is this application or information collection new or is an existing one being modified?

An existing one is being modified.

Does this application collect, maintain, and/or disseminate information in identifiable form (IIF)?

The Texas Aerospace Scholars web application collects, maintains, and disseminates information in identifiable

format

Mission Program/Project Supported: Education Office **Identifying Numbers (Use N/A, where appropriate)**

Privacy Act System of Records Number: 10-SPER

OMB Information Collection Approval Number and Expiration Date: none

Other Identifying Number(s): None.

Description

1. Provide an overview of the application or collection and indicate the legislation authorizing this activity.

This system distributes information to participants of a NASA administered but Texas state legislature funded program. The system collects information on applicants, handles homework assignments that are submitted by participants, handles travel itineraries for the participating students, manages team assignments, and logs mentor, teacher, and coop placement.

Describe the information the agency will collect, maintain, or disseminate and how the agency will use the information. In this description, indicate whether the information contains IIF and whether submission is voluntary or mandatory.

The system collects and uses the following information:

- Student Names (IIF Optional) used to identify the students throughout the program and to arrange for travel. Failure to provide data may impair a student's ability to qualify for enrollment in the educational program.
- Date of Birth (IIF Optional) used to verify that students are eligible to participate in the program.
 Failure to provide data may impair a student's ability to qualify for enrollment in the educational program.
- Social Security Number (IIF Optional) used to reimburse payment for travel and verify citizenship.
 Failure to provide data may impair a student's ability to qualify for enrollment in the educational program.
- Mailing Address (IIF Optional) used to send program related documents to the students, arrange travel, and log the legislative districts that are being serviced by the program. Failure to provide data may impair a student's ability to qualify for enrollment in the educational program.
- Phone Numbers (IIF Optional) used to follow-up on student assignments, travel information, and as an emergency contact number when the students are on-site during the summer. Failure to provide data may impair a student's ability to qualify for enrollment in the educational program.
- Medical Notes (IIF optional) used to ensure the well-being of the students when they are on site
 during the summer
- E-mail Address (IIF Optional) used as the primary form of contact during the school-year when students are participating remotely. Failure to provide data may impair a student's ability to qualify for enrollment in the educational program.
- Education Records (IIF Optional) used to ensure that the students are academically eligible to
 participate in the program. Failure to provide data may impair a student's ability to qualify for
 enrollment in the educational program.
- Explain how the IIF collected, maintained, and/or disseminated is the minimum necessary to accomplish the purpose for this effort.

All of the collected information stated above is necessary for the successful administration of this program.

4. Explain why the IIF is being collected, maintained, or disseminated.

Explained in Question number 2.

5. Identify with whom the agency will share the IIF.

The agency shares no IIF with anyone outside of the agency. Summaries of information, such as "state districts represented" may be published but do not contain personal information regarding the students.

6. Describe how the IIF will be obtained, from whom it will be collected, what the suppliers of information and the subjects will be told about the information collection, and how this message will be conveyed to them (e.g., written notice, electronic notice if a Web-based collection, etc.). Describe any opportunities for consent provided to individuals regarding what information is collected and how the information will be shared.

The IIF is obtained through online and paper forms from high school juniors and teachers in the state of Texas. In addition, the online system also collects minimal IIF from JSC employees and co-ops that are applying to mentor groups. The suppliers of the information are notified of the JSC Web Accessibility and Policy Notices through a link at the bottom of each Webpage. Suppliers of information are notified electronically at the time that they are inputting information.

 State whether personal information will be collected from children under age 13 on the Internet and, if so, how parental or guardian approval will be obtained. (Reference: Children's Online Privacy Protection Act of 1998)

No information is collected from children under the age of 13.

8. Describe how the IIF will be secured.

All access to IIF is behind a password protected SSL folder on a JSC network. Backup drives of the IIF are stored offline behind physical security devices.

9. Describe plans for retention and destruction of IIF.

All electronic IIF is stored in the same secure manner for a period of at least five years. Once the data has been deemed unnecessary to maintain, it will be deleted. Retention Schedule: <u>Schedule 1 Item 32 Sub-Item A</u>

 Identify whether a system of records is being created under section 552a of Title 5, United States Code (the Privacy Act), or identify the existing Privacy Act system of records notice under which the records will be maintained.

The system is covered under 10-SPER.

The following decisions resulted from conducting the PIA:

#1. IIF access rules of conduct will be established.

PIA Resultant Decisions

The following decisions have been made as a result of conducting this Privacy Impact Assessment:

- 1. Develop a complaint process whereby individuals may follow if they believe their IIF has been inappropriately obtained, used, or disclosed, or that the IIF is inaccurate.
- 2. Develop a process for periodic reviews to ensure IIF data integrity, availability, accuracy and relevancy.

Identify a point of contact to whom a member of the public can address questions concerning this information system and the privacy concerns associated with it: <u>Charla Stuart</u>.

ouglas W. Goforth		
ASA Cognizant Official		
ate		
oncur:	Concur:	

Herbert J. Babineaux, Jr.	Jean E. Carter		
Center Privacy Act Manager	Center Chief Information Officer		
Date	Date:		
Concur:	Approved for Publication:		
Patti F. Stockman	– Patricia L. Dunnington		
	Chief Information Officer		
NASA Privacy Act Officer	Chief Information Officer		
Date:	Date:		